

C

Dysart Reply Affidavit – Attachment C

CLEC "X" RESULTS COMPARISON UNE LOOP AND COMBOS

MKT	PM	BEFORE		AFTER		SWBT
		RESULT	Z-VALUE	RESULT	Z-VALUE	
CW	35-11	5.00	0.66	5.00	0.66	3.97
DF		7.94	1.79	10.05	3.04	4.99
HS		9.41	3.69	9.41	3.69	3.77
ST		8.22	1.59	9.59	2.13	4.31
CW	35-12	1.88	1.40	2.37	2.94	1.44
DF		1.58	0.13	2.61	3.09	1.53
HS		1.32	-1.23	2.56	2.13	1.78
ST		1.55	-0.30	2.20	1.09	1.69
CW	37-03	1.62	-7.46	1.80	-5.43	2.28
DF		1.33	-12.41	1.53	-10.22	2.44
HS		1.71	-10.56	1.93	-8.40	2.77
ST		1.58	-8.37	1.80	-6.88	2.85
CW	37.1-03	1.32	-6.21	1.35	-5.78	1.81
DF		1.09	-11.04	1.16	-10.10	1.98
HS		1.40	-9.00	1.44	-8.55	2.20
ST		1.30	-7.12	1.38	-6.52	1.77
CW	38-05	9.47	-2.81	10.24	-2.38	13.52
DF		16.11	0.14	15.30	-0.37	15.87
HS		5.09	-0.76	5.75	-0.09	5.83
ST		10.22	1.31	9.65	1.07	7.86
CW	38-06	0	-.93	0	-1.00	1.97
DF		4.55	0.28	4.08	0.13	3.74
HS		0	-0.68	1.69	0.66	0.89
ST		0	-0.42	0	-0.46	0.67
CW	39-09	24.71	-5.59	24.63	-5.81	51.46
DF		33.71	-5.23	30.57	-6.09	72.02
HS		25.23	-7.78	26.94	-8.06	10.44
ST		43.90	-3.39	42.83	-3.79	76.27
CW	39-10	7.62	-0.72	7.94	-0.74	13.14
DF		7.09	-0.63	6.67	-0.72	20.06
HS		4.91	-0.64	4.28	-0.79	10.44
ST		8.49	-0.28	11.42	0.02	11.28
CW	39-11	26.45	-1.09	27.18	-0.85	29.31
DF		32.96	-1.89	31.81	-2.44	38.70
HS		26.58	-1.18	25.96	-1.61	28.76
ST		32.97	-1.38	34.20	-1.12	38.04

CW	39-12	15.83	-0.17	14.48	-0.41	16.87
DF		29.86	1.05	28.48	0.87	22.73
HS		10.64	0.39	12.70	1.15	9.51
ST		15.73	-0.32	15.73	-0.32	18.03
CW	40-03	68.51	-1.00	68.09	-0.87	66.01
DF		63.46	-1.40	64.66	-1.96	59.48
HS		74.06	-2.08	74.58	-2.41	69.07
ST		69.23	-2.19	66.10	-1.48	60.66
CW	41-03	12.33	1.36	11.96	1.17	10.33
DF		10.90	1.72	10.35	1.45	8.39
HS		12.07	1.94	12.20	2.14	9.37
ST		8.89	-0.07	7.69	-0.67	9.03



D



Dysart Reply Affidavit – Attachment D

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Application of Southwestern)	
Bell Telephone Company to Provide Notice of)	
Intent to File an Application for Authorization to)	Case No. TO-99-227
Provide In-Region InterLATA Services)	
originating in Missouri Pursuant to Section 271)	
of the Telecommunications Act of 1996.)	

**SOUTHWESTERN BELL TELEPHONE COMPANY'S
RESPONSE TO AT&T COMMUNICATIONS OF THE SOUTHWEST, INC.'S
MOTION TO SUBMIT COMMENTS**

COMES NOW Southwestern Bell Telephone Company (SWBT) and submits its Response to AT&T Communications of the Southwest, Inc.'s (AT&T's) Motion to Submit Comments on Supplemental Telcorida Texas Performance Measure Review and Comments on Supplemental Telcordia Texas Performance Measure Review Report (Supplemental Comments) to the Missouri Public Service Commission (Commission):

I. INTRODUCTION

AT&T's December 19, 2000, Supplemental Comments regarding the accuracy and reliability of SWBT's performance measurements data is yet another last ditch attempt to delay SWBT's entry into long distance in Missouri by whatever means possible. Three months ago, SWBT addressed in detail, and refuted, AT&T's testimony challenging the integrity of SWBT's data.¹ Shortly thereafter, notwithstanding AT&T's propensity to "port" arguments from one state to another, both the Oklahoma Corporation Commission and the Kansas Corporation Commission recommended approval of SWBT's 271 applications in Oklahoma and Kansas (on

¹ SWBT previously addressed, and rebutted, the few data integrity criticisms lodged by AT&T. See, Reply Affidavit of William R. Dysart, filed on September 20, 2000 ("Dysart Reply Affidavit"), replying to AT&T, Direct Testimony of Eva Fettig, filed on August 28, 2000, Case No. TO-99-227.

work, or for deferring this Commission's consideration of SWBT's 271 application pending receipt of additional months of performance data, as AT&T requests. Doing so would not provide the Commission with answers to any legitimate questions. Rather, it would only permit AT&T to raise yet more questions designed to limit the entry of an additional long distance competitor in Missouri, while wasting the resources of the Commission and multiple parties.

September 28 and October 4, 2000, respectively), despite AT&T's performance data integrity and other assorted performance-related claims.

In this latest effort to stall SWBT's Missouri 271 application, AT&T attempts to attack the integrity of the performance data audit work of the highly respected public accounting firm Ernst & Young ("E&Y") by touting the related work of another firm, Telcordia Technologies ("Telcordia"). AT&T reasons that since E&Y's report did not mention each of the matters mentioned in Telcordia's report, E&Y's report necessarily must be short of the mark, and thus, the integrity of SWBT's performance data remains unproven in Missouri. AT&T conveniently fails to mention that the very firm whose work it now elevates (Telcordia) has been the subject of AT&T's intense criticism in the past. AT&T also omits to point out that the report upon which it relies is generally quite favorable to SWBT, while AT&T blows far out of proportion certain issues that Telcordia identified that have since been resolved. Moreover, as discussed in detail below, many of these issues described in the Telcordia report are so inconsequential that there was simply no reason for E&Y to have dwelled on them. Finally, AT&T again questions SWBT's data integrity controls, though these matters have been laid to rest by both the Texas PUC and FCC.

Although AT&T's Supplemental Comments filing is clearly not contemplated under the procedural schedule in this case, SWBT has no objection to including in the record of these Missouri proceedings the Southwestern Bell Performance Measurement Review Report ("PM Review Report") and D

the Business Rules, they too have been resolved. As Telcordia stated, it “reviewed SWBT source code[s] and verified that SWBT corrected these problems.”⁵

Telcordia’s PM Review Report validated the integrity of SWBT’s performance data in several key respects. Furthermore, while Telcordia’s review was conducted for the benefit of the Texas PUC, the systems and processes used to generate SWBT’s Missouri performance data are the same as those utilized in Texas.⁶ Thus, Telcordia’s conclusions further validate the accuracy and reliability of SWBT’s Missouri performance data.

AT&T’s attempt to draw upon certain portions of the report to support its criticisms of E&Y (without fairly conveying the overarching features of the report that speak well of SWBT’s data processes) should be rejected. AT&T has in the past criticized, and continues to criticize, Telcordia’s performance measurements auditing work.⁷ Given this history, AT&T’s now touting limited portions of Telcordia’s PM Review Report is suspect at best.

In comparing the Telcordia and E&Y reports, it is important to understand the differences in both the scope of the reports and the time period from which data was validated. E&Y performed an extensive examination of performance measurements in Missouri for the period April 1, 2000 through June 30, 2000. E&Y’s examination consisted of control testing, program

⁵ Id.

⁶ Dysart Reply Affidavit, ¶ 23.

⁷ AT&T first questioned the results of Telcordia’s audit work in connection with SWBT’s Texas 271 application. *SBC Texas Order*, ¶¶ 57, 429, & n.1255. Two months after the FCC rejected AT&T’s argument that SWBT’s performance data are unreliable, *SBC Texas Order*, ¶ 429, AT&T nonetheless proceeded to file in this particular proceeding a litany of criticisms regarding the work of Telcordia. AT&T, Direct Testimony of Eva Fettig, filed on August 28, 2000, Case No. TO-99-227, at pp. 13-14 (e.g., “Telcordia’s review was too limited and too subjective....” “Telcordia did not independently test....” “Telcordia did not document....” “Telcordia did not compare....” “Telcordia made no attempt to assess or validate....”). In fact, AT&T’s present motion continues to criticize the very firm whose report it attempts to leverage against E&Y. AT&T Motion, at p. 2, n. 1 (“Telcordia’s supplemental PM review is subject to many of the same shortcomings as the larger performance measures review that was included in its final September 1999 report to the Texas Commission....”).

code review, recalculations and other procedures on a sample of 55 performance measurements to test that the reported performance measurement results were materially accurate in accordance with version 1.6 of the business rules. Telcordia reviewed the PM business rules 1.6 and corresponding interpretations by SWBT for 16 PMs only. The E&Y scope was more comprehensive as E&Y expressed an opinion on the accuracy of the PMs and corresponding data collection processes. Of the 16 PMs reviewed by Telcordia, 4 were tested by E&Y as part of a sample of 55 PMs, totaling 67 PMs tested by either firm of a total of 103 PMs (27 PMs were eliminated as part of business rules version 1.7).

B. Three “Version 1.7” Issues

Of the 34 issues identified by Telcordia, three (N32, N33 and N34) had to do only with Version 1.7 of the Business Rules, not Version 1.6.⁸ Yet, the scope of E&Y’s work was expressly limited to Version 1.6. Thus, it is quite understandable that E&Y did not discuss the three issues identified by Telcordia. Nothing in the Version 1.7 Issues identified by Telcordia indicates that E&Y did not properly review Version 1.6 Performance Data.

C. Nine “Informational-Purposes-Only” Issues

Nine issues (N2, N3, N5, N11, N24, N25, N26, N29, N30) are informative, but had no impact upon either the accuracy or reliability collected and reported. For example, it is of no consequence or wholly irrelevant to the integrity of SWBT’s data (1) that PM 55.2 data are drawn from Service Order Tracking (SOT) instead of Work Force Administration (WFA) (as indicated in the business rule) when WFA drives the SOT OSS (N3); (2) that SWBT excluded holidays and weekends from the data for PM 93, when the measure captures data expressed as percentages (N11); (3) that the term “CLEC” was misspelled as “CCLEC” (N24); or (4) that

⁸ PM Review Report, at pp. 34-35 (Tables 4 and 5).

Telcordia reviewed PM 70.1, PM 96 and PM 97 in Phase II (and “had no issue” as to any) rather than in Phase I (N25; N26; N29). AT&T does not allege that any of these matters concretely affected the accuracy or reliability of SWBT’s data and none of these matters had such an effect.

D. Two “PMs-Not-Yet-Implemented” Issues

Two issues involved Telcordia’s inability to review any data relative to PM 102 and PM 113 (N27;N28). These PMs were not reviewed by E&Y, and indeed would not have been reviewed since they had not been implemented during the April-June, 2000 time frame which was the subject of E&Y’s review. As SWBT previously disclosed when it supplemented its Missouri 271 application in June, 2000, PM 102’s implementation remains dependent “upon a software update not yet offered by switch manufacturers.”⁹ And, while SWBT then reported that it was “working toward developing data collection processes” for PM 113,¹⁰ this measurement was implemented only last month.

E. Twelve “Business Rule Wording” Issues

Twelve issues highlighted the need, within various Version 1.6 business rules, for more clear language, for more precise language, for resolution of internal inconsistencies presented by different portions of the same business rule, and like minor matters (N4; N6; N7; N9; N12; N14; N15; N16; N18; N20; N21; N23). However, in all cases, SWBT’s implementation of the business rules had no impact on the data reported, and the “wording” issues were all resolved with Version 1.7. Importantly, none of these “issues” criticize the manner in which SWBT implemented the measurement; indeed, SWBT’s implementation was validated by Version 1.7’s new rules. Such issues simply highlight the usefulness of “clean-up” efforts attendant to a

⁹ Affidavit of William R. Dysart, filed on June 28, 2000, ¶150.

¹⁰ Id.

regularly scheduled performance measurements review process. Nothing in these matters cast any doubt on the accuracy of the E&Y review.

F. Two “Exclusions-Not-Taken” Issue

Two issues involved SWBT’s having failed to exclude data that it was entitled to exclude from the reported results for PM 56.1 and PM 98 (N8; N13). But, in each case, the data reported cast SWBT’s performance for CLECs in a less attractive light than would have been the case had SWBT taken advantage of the exclusions. AT&T has no cause to complain of such consequences.

G. Three “Corrective Action” Issues Resolved Before E&Y’s Audit

Three issues identified as requiring corrective actions were fully implemented by the time that E&Y commenced its audit, and thus were not identified by E&Y (N1; N10; N22). In each case, Telcordia independently satisfied itself that SWBT actually implemented the required corrective action. Having done so, it “closed” the issue on each one.

H. Two “Company-Level-Reporting” Issues

Two issues involve PM 10.1 and PM 11.1, where SWBT reported data on a five-state basis, rather than a state-specific basis, as called for by the Version 1.6 Business Rules for these measurements (N17; N19). However, SWBT began state-specific reporting of data for each of these measurements six months ago with May data, and no CLEC has demonstrated any prejudice in SWBT’s not having done so earlier. Moreover, each of SWBT’s monthly Performance Measurement Tracking Reports provided to the Department of Justice and made available to CLECs openly disclosed SWBT’s company-level reporting. Again, nothing here raises any questions concerning SWBT’s performance measurement data or E&Y’s review of that data.

I. One “Fax-Timestamp” Issue

As noted above, one issue involved SWBT’s having employed incorrect manual procedures for PM 95 (N31). However, that circumstance “worked against SWBT” in that it “added an hour to the CLEC response time reported in the PM.”¹¹ In any event, the issue is moot because PM 95 has been eliminated from Version 1.7 of the Business Rules. Performance Measures that were eliminated in Version 1.7 of the Business Rules were not within the scope of the E&Y audit. Per Staff’s directions, the E&Y review appropriately focuses on those Version 1.6 measurements that continued in force under Version 1.7, and nothing in the Telcordia review casts doubt on the E&Y Report.

III. TELCORDIA’S DATA CONTROL INTEGRITY REASSESSMENT

AT&T’s discussion of Telcordia’s Data Control Integrity Reassessment is very limited. That is understandable, because Telcordia’s reassessment (like its PM Review Report) provides no support to AT&T’s attempt to demean the integrity of SWBT’s performance data. In fact, the reassessment is unequivocal in its endorsement of SWBT’s data integrity controls. AT&T’s single criticism is without merit and merely highlights the lack of any material issues regarding the integrity of SWBT’s data.

Specifically, Telcordia reviewed SWBT’s systems and general control mechanisms for handling performance measurement data in the new “Microsoft Access and VB Scripts” environment. As a result of that review, Telcordia concluded:

- that “SWBT’s PM team members were consistent and clear about the details of the PM process” and that “Telcordia is satisfied that the PM process is documented.”
- that “the absence of a key PM [team] member did not affect the overall PM process” and

¹¹ Id.

- that “Telcordia is satisfied that SWBT has more than one PM team member capable of completing all tasks.”
- that “[d]ata integrity throughout the PM process has been significantly improved.”
- that “the direction in which SWBT is developing the new PM processing system is appropriate.”
- that “SWBT has implemented 100% of the PM[s] into the PIP¹² tracking system.”¹³

In view of these highly complimentary conclusions, it is inconsequential that E&Y’s report does not specifically state that E&Y’s general controls review considered SWBT’s historic system (i.e., not its new system, utilizing Microsoft Access and VB Scripts, that is running “parallel” to its historic system). First, the scope of E&Y’s audit did not require that it consider the new system. Second, the Texas PUC recommended approval of SWBT’s Texas 271 application, and the FCC approved that application in June, 2000, on the basis of a record showing merely that SWBT had “agreed to” implement in the future many of the data control integrity measures referenced in Telcordia’s November 2000 reassessment.¹⁴ There was no record evidence of the type AT&T deems necessary. Third, even if E&Y’s Missouri engagement had included a review of the new system, there is no indication that E&Y’s review would have concluded anything other than did Telcordia, given that the systems and processes used to generate SWBT’s Missouri performance data are the same as those utilized in Texas. As discussed above, Telcordia expressly noted the improvement in data integrity throughout SWBT’s performance measurements system and did not call that data integrity into question.

¹² A “PIP” denotes an improvement in a SWBT data collection and/or reporting process which has been initiated and whose implementation is in progress, i.e., a “process improvement in progress.”

¹³ Telcordia Data Control Integrity Reassessment,” at p. 8.

¹⁴ *SBC Texas Order* (¶ 429) (“While Telcordia did make several recommendations regarding SWBT’s data control mechanisms, we note that SWBT has agreed to implement each of these measures.”).

IV. CONCLUSION

Both Telcordia's and E&Y's conclusions regarding the integrity of SWBT's data control measures refute AT&T's generalized concerns regarding the integrity of SWBT's data. AT&T's reliance on the Telcordia reassessment as a means to attempt to undercut E&Y's conclusions is unavailing. Consequently, there is no need to reopen the matter of E&Y's methodologies or procedures. Nor is there any need to await further performance data before concluding that SWBT's data reflect SWBT's continued compliance with the section 271 checklist.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

BY

PAUL G. LANE	#27011
LEO J. BUB	#34326
ANTHONY K. CONROY	#35199
MIMI B. MACDONALD	#37606

Attorneys for Southwestern Bell Telephone Company
One Bell Center, Room 3520
St. Louis, Missouri 63101
314-235-4300 (Telephone)/314-247-0014 (Facsimile)
paul.lane@sbc.com (E-Mail)

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing document were served to all parties on the Service List by hand or overnight delivery on December 29, 2000.

Paul G. Lane

DAN JOYCE
MISSOURI PUBLIC SERVICE COMMISSION
PO BOX 360
JEFFERSON CITY, MO 65102

W. R. ENGLAND, III
BRYDON, SWEARENGEN & ENGLAND
P.O. BOX 456
JEFFERSON CITY, MO 65102

MARK W. COMLEY
NEWMAN COMLEY & RUTH
P.O. BOX 537
JEFFERSON CITY, MO 65102

JAMES M. FISCHER, P.C.
101 W MADISON STREET, SUITE 400
JEFFERSON CITY, MO 65101

KEVIN ZARLING
MICHELLE BOURIANOFF
AT&T COMMUNICATIONS OF THE
SOUTHWEST, INC
919 CONGRESS, SUITE 1500
AUSTIN, TX 78701

STEPHEN F. MORRIS
MCI TELECOMMUNICATIONS CORP.
701 BRAZOS, SUITE 600
AUSTIN, TX 78701

CHARLES BRENT STEWART
STEWART & KEEVIL, LLC
1001 CHERRY STREET, SUITE 302
COLUMBIA, MO 65201
MARY ANN (GARR) YOUNG
WILLIAM D. STEINMEIER, P.C.
P.O. BOX 104595
JEFFERSON CITY, MO 65110

TIM SWANSEN
KARL ZOBRIST
BLACKWELL SANDERS PEPPER MARTIN LLP

MICHAEL F. DANDINO
OFFICE OF THE PUBLIC COUNSEL
PO BOX 7800
JEFFERSON CITY, MO 65102

PAUL S. DEFORD
LATHROP & GAGE, L.C.
2345 GRAND BLVD.
KANSAS CITY, MO 64108

CRAIG S. JOHNSON
ANDERHECK, EVANS, MILNE, PEACE,
JOHNSON, LLC
P.O. BOX 1438
JEFFERSON CITY, MO 65102

STEPHEN D. MINNIS
SPRINT COMMUNICATIONS COMPANY L.P.
5454 W 100 STREET
OVERLAND PARK, KS 66211

CARL J. LUMLEY
LELAND B. CURTIS
CURTIS OETTING HEINZ GARRETT &
SOULE, P.C.
130 S. BEMISTON, SUITE 200
ST. LOUIS, MO 63105

RICHARD S. BROWNLEE, III
HENDREN AND ANDRAE LLC
221 BOLIVARD STREET
JEFFERSON CITY, MO 65101

PAUL H GARDNER
GOLLER, GARDNER AND FEATHER PC
131 E HIGH STREET
JEFFERSON CITY, MO 65101
MICHAEL FERRY
GATEWAY LEGAL SERVICES, INC.
4232 FOREST PARK AV., SUITE 18000
ST. LOUIS, MO 63108

JEREMIAH W. NIXON
RONALD MOLTENI
ATTORNEY GENERAL OF MISSOURI

2300 MAIN STREET, SUITE 1100
KANSAS CITY, MO 64108

PETER MIRAKIAN III
SPENCER FANE BRITT & BROWNE LLP
1000 WALNUT STREET, SUITE 1400
KANSAS CITY, MO 64106

EDWARD CADIEUX
GABRIEL COMMUNICATIONS, INC.
10690 SWINGLEY RIDGE RD, SUITE 500
CHESTERFIELD, MO 63017

MICHAEL SLOAN
SWIDLER BERLIN SHEREFF FRIEDMAN
3000 K STREET, NW, SUITE 300
WASHINGTON, DC 20007

P.O. BOX 899
JEFFERSON CITY, MO 65102

BRADLEY R. KRUSE
MCLEODUSA TELECOMMUNICATIONS
SERVICES, INC.
6400 C STREET, SW
CEDAR RAPIDS, IA 52406

KATHLEEN M. LAVALLE COHAN SIMPSON
COWLISHAW & WULFF
2700 ONE DALLAS CTR 350 N ST. PAUL
DALLAS, TX 75201

Telcordia Technologies Southwestern Bell Performance Measurement

Review Report Dated November 2000

Summary of Issues

During their review Telcordia examined the sixteen Performance Measures (“PMs”) which had not been implemented as of their initial audit during 1999. A detailed list of these PMs can be found in Table 1 of their Report.

As documented in Attachment A of their report Telcordia discovered 34 issues during their review. These 34 issues can be categorized as follows.

Version 1.7 issues	3
Informational issues	9
PMs not implemented	2
Minor business rule documentation/wording issues	12
Issues related to SWBT not taking valid exclusions	2
Issues where corrective actions were implemented prior to E&Y audit	3
Disaggregation issue where SWBT reported data by company rather than by state	2
Fax timestamp issue	<u>1</u>
Total issues	<u>34</u>

Version 1.7 Issues (3 Issues)

Version 1.7 Business Rules were explicitly excluded from the scope of the E&Y Missouri PM audit.

PR-N32	PM 96
PR-N33	PM 96
PR-N34	PM 97

Informational Issues (9 Issues)

Information issues are essentially observations made by Telcordia, which have no impact whatsoever on the calculation of the PMs or the reported results. For example, PR-N24 notes a misspelling in Version 1.6 of the business rules related to PM 57; PR-N29 makes the observation that Telcordia neglected to review PM 70.1 during the first phase of their review in April 2000. PM 70.1 was reviewed in July and Telcordia found no issues at that time. PR-N25 and PR-N26 both refer to PMs which had not been implemented as of Phase I (April 2000) but were reviewed without exception during Phase II (July 2000) by Telcordia.

PR-N2	PM 55.2
PR-N3	PM 55.2
PR-N5	PM 55.2
PR-N11	PM 93
PR-N24	PM 57
PR-N25	PM 96
PR-N26	PM 97
PR-N29	PM 70.1
PR-N30	PM 93

Issues Not Implemented at Time of Telcordia Review (2 Issues)

PR-N27	PM 113
PR-N28	PM 102

PM 113 – Percentage of Electronic Updates that Flow Through the DSR Process without Manual Intervention was implemented beginning in November 2000.

PM 102 – Average Time to Clear Errors (E-911) has not yet been implemented. A software patch from a vendor is required.

Minor Business Rule Documentation/Wording Issues Related to Implemented PMs (12 Issues)

<u>Issue Number</u>	<u>PM Number</u>	<u>Discussion</u>
PR-N4	PM 55.2	Telcordia found the Version 1.6 business rules did not list out the levels of disaggregation in the precise detail as that which was reported. Telcordia verified this was corrected in the Version 1.7 business rules.
PR-N6	PM 55.2	Interval start time was incorrect in the business rule. Telcordia verified this was corrected in the Version 1.7 business rules.
PR-N7	PM 55.2	Telcordia found a second issue for this PM where the Version 1.6 business rules did not list out the levels of disaggregation in the precise detail as that which was reported. Telcordia verified this was corrected in the Version 1.7 business rules.
PR-N9	PM 56.1	Business rule documentation issue. Telcordia verified the appropriate documentation was present in the Version 1.7 business rules.
PR-N12	PM 95	Telcordia noted the business rules failed to include an exclusion for weekends, nights and holidays. However, the benchmark did indicate "business hours". PM 95 was eliminated with Version 1.7.
PR-N14	PM 98	SWBT was taking an exclusion which Telcordia believed was inconsistent with the Version 1.6 business rules. This exclusion was explicitly added by Version 1.7.
PR-N15	PM 55.1	Telcordia noted the Version 1.6 business rules were drafted prior to the availability of mechanized loop qualification information. Telcordia verified that the Version 1.7 business rule wording does accurately describe SWBT's current processes.
PR-N16	PM 55.1	Telcordia observed an inconsistency in the definition of the Version 1.6 business rules for this PM. Telcordia verified this was corrected with Version 1.7.

<u><i>Issue Number</i></u>	<u><i>PM Number</i></u>	<u><i>Discussion</i></u>
PR-N18	PM 10.1	Telcordia noted SWBT implemented this PM on a "business hours" basis but the business rule documentation did not make this apparent. Telcordia verified the appropriate wording was present in the Version 1.7 business rules.
PR-N20	PM 11.1	Telcordia noted SWBT implemented this PM on a "business hours" basis but the business rule documentation did not make this apparent. Telcordia verified the appropriate wording was present in the Version 1.7 business rules.
PR-N21	PM 57	Telcordia noted only manual loop makeup requests were being included in this PM. The Version 1.6 business rule documentation did not make this apparent. Telcordia verified the appropriate wording was present in the Version 1.7 business rules.
PR-N23	PM 57	Telcordia noted SWBT excluded weekends and holidays in implementing this PM; however, the Version 1.6 business rule documentation did not support this treatment. Telcordia verified the appropriate wording was present in the Version 1.7 business rules.

- ❖ Those PMs which were eliminated with Version 1.7 were explicitly excluded from E&Y's scope for their Missouri audit. The MPSC Staff agreed with this treatment at the initial audit planning meeting in July 2000.

Issues Related to SWBT not Taking Valid Exclusions (2 Issues)

<u><i>Issue Number</i></u>	<u><i>PM Number</i></u>	<u><i>Discussion</i></u>
PR-N8	PM 56.1	Telcordia noted that SWBT was not taking a valid exclusion for NPAC caused delays. This still remains an open issue because SWBT is unable to obtain the information required to implement the exclusion. Telcordia moved this issue to a minor status in their final report because as they acknowledge, this failure to account for the exclusion only adversely affects SWBT.
PR-N13	PM 98	SWBT was not taking a valid exclusion because the source data did not include critical data fields. This exclusion was eliminated with Version 1.7.

Issues Where Corrective Actions Were Implemented Prior to E&Y Audit (3 Issues)

In the case of these three issues, Telcordia discovered errors which did impact the calculation and reporting of the PM results. Telcordia verified that SWBT had revised its programming code and corrected the problems. Implementation of the new programming began with April 2000 data which coincided with the start of the E&Y Missouri PM audit.

<u><i>Issue Number</i></u>	<u><i>PM Number</i></u>	<u><i>Discussion</i></u>
PR-N1	PM 55.2	Telcordia noted a programming error by SWBT in implementing this PM. Telcordia verified that SWBT had corrected this coding in April 2000.
PR-N10	PM 93	Telcordia noted an invalid calculation in implementing this PM. Telcordia verified that SWBT had corrected the programming in April 2000.
PR-N22	PM 57	Telcordia noted SWBT was not including the time of day in its implementation of this PM. Telcordia verified that SWBT had revised the programming code for this PM for reporting of April 2000 data.

Disaggregation Issue Where SWBT Reported Data by Company Rather Than by State (2 Issues)

As clearly identified by SWBT in its reporting, these measures were reported using Company data and could not be transitioned over to State specific until June 2000. This fact had been clearly communicated to the users of SWBT's PM reports.

<u><i>Issue Number</i></u>	<u><i>PM Number</i></u>	<u><i>Discussion</i></u>
PR-N17	PM 10.1	Telcordia noted that SWBT was reporting this PM on an aggregated company basis rather than by state. Telcordia verified that SWBT began reporting the disaggregation by individual State in June 2000.
PR-N19	PM 11.1	Telcordia noted that SWBT was reporting this PM on an aggregated company basis rather than by state. Telcordia verified that SWBT began reporting the disaggregation by individual State in June 2000.

Fax Timestamp Issue (1 Issue)

This issue was also discovered by E&Y during their audit and appeared in the final E&Y report. SWBT has taken corrective action which should help ensure the correct fax timestamps are entered in the future. E&Y verified the implementation of this corrective action.

<u>Issue Number</u>	PM Number	<u>Discussion</u>
PR-N31	PM 95	Telcordia noted an incorrect fax timestamp was being entered on certain faxed orders. Although this particular PM was eliminated with Version 1.7 SWBT has stressed the importance of the correct timestamp to LSC personnel. SWBT has also implemented additional control procedures at the LSC to help ensure correct timestamps are entered.

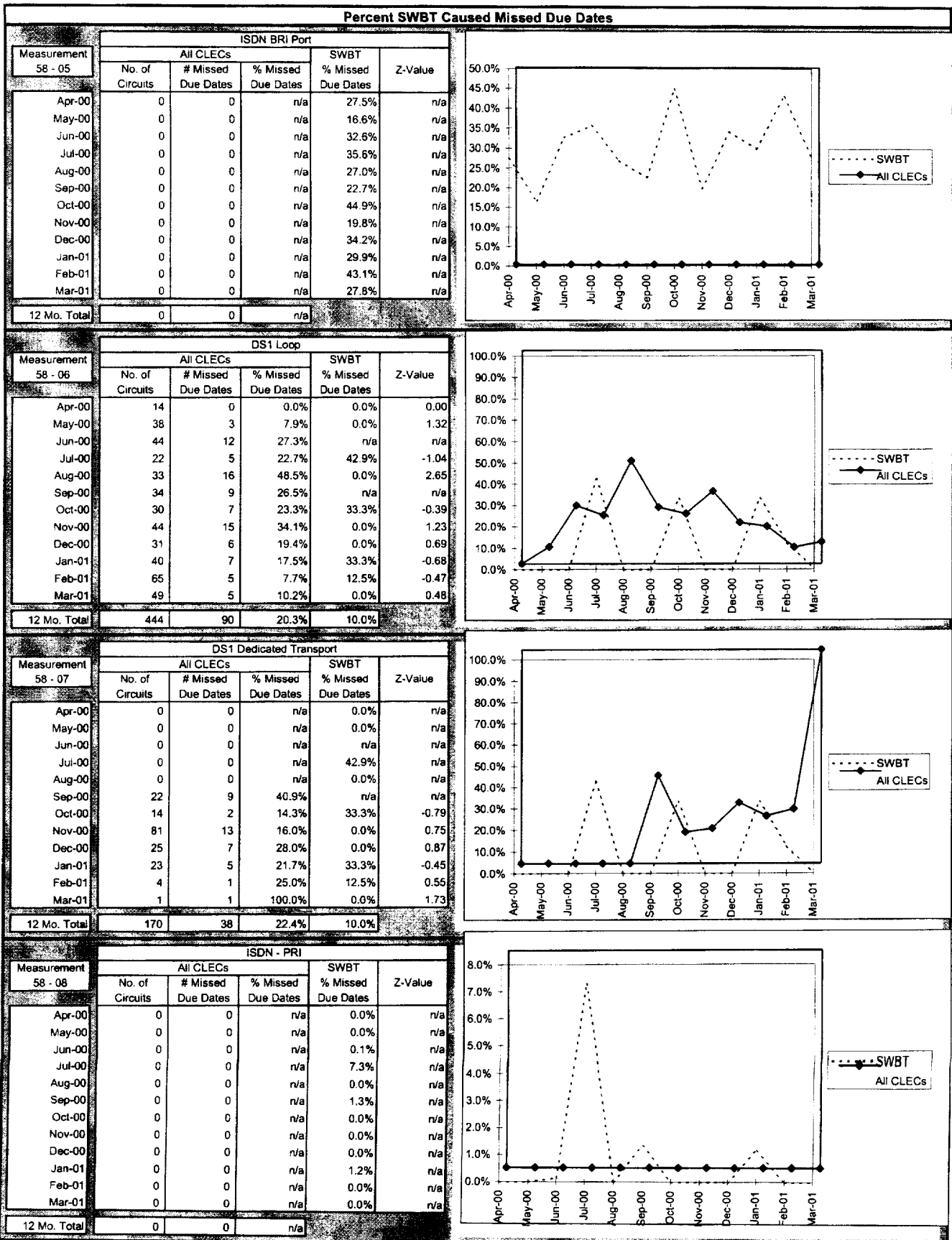
Dysart Reply Affidavit – Attachment E

PERFORMANCE MEASUREMENT TRACKING

Provisioning - Unbundled Network Elements (UNE)

March 2001

Kansas City, MO



PERFORMANCE MEASUREMENT TRACKING

March 2001

Provisioning - Unbundled Network Elements (UNE)

St. Louis

